

South Coast Air Quality Management District

Statement of Basis

Proposed Renewal Title V Permit

Facility Name:	MCP Foods, Inc.
Facility ID:	002825
NAICS Code:	31193
Equipment Location:	424-425 Atchison Street Anaheim, CA 92805
Application #(s):	495043
Application Submittal Date(s):	01/21/09
Permit Revision #:	Renewal
Revision Date:	Pending
Permit Section(s) Affected:	Sections D, H & K
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1. Introduction and Scope of Permit

Title V is a national operating permit program for air pollution sources. Facilities subject to Title V must obtain a Title V permit and comply with specific Title V procedures to modify the permit. This permit replaces the facility's other existing permits. Title V does not necessarily include any new requirements for reducing emissions. It does, however, include new permitting, noticing, recordkeeping, and reporting requirements.

The AQMD implements Title V through Regulation XXX – Title V Permits, adopted by the AQMD Governing Board in order to comply with EPA's requirement that local air permitting authorities develop a Title V program. Regulation XXX was developed with the participation of the public and affected facilities through a series of public workshops, working group meetings, public hearings and other meetings.

The Title V major source threshold for a particular pollutant depends on the attainment status of the pollutant. NO₂, SO₂, CO and lead are in attainment with federal standards. The status for PM-10 is serious nonattainment. The status for ozone is currently extreme non-attainment. For the South Coast Air Basin (SOCAB) the threshold levels are as follows:

Pollutant	SOCAB Major Source Thresholds (tons/yr)	MCP Food's Status
VOC	10	Above Threshold
NOx	10	Below Threshold
SOx	100	Below Threshold
CO	50	Below Threshold
PM-10	70	Below Threshold
Single HAP	10	Below Threshold
Combination of HAPS	25	Below Threshold

A Title V permit is proposed to be issued to cover the operations of MCP Food, Inc, located at 424-425 S. Atchison Street, Anaheim. This facility is subject to Title V requirements because it is a major source.

2. Facility Description

This is an existing facility that is in the business of producing flavors used in beverage, sweet goods, dairy, oral care and nutrition products. Flavor manufacturing can be broken down into three basic operations: syrup preparation, extrusion and size reduction, and drying.

3. Construction and Permitting History

The facility has been in constant operation since 1926 when it began processing citrus under the name of Mutual Citrus Product (MCP). Numerous permits to construct and permits to operate have been issued to the facility since 1961. An initial Title V permit was issued to the facility on July 30, 2004, and subsequent revisions were issued on November 29, 2006, March 29, 2007 and January 3, 2008.

4. Regulatory Applicability Determinations

Applicable legal requirements for which this facility is required to comply are required to be identified in the Title V permit (for example, Section D, E, and H of the proposed Title V permit). Applicability determinations (i.e., determinations made by the District with respect to what legal requirements apply to a specific piece of equipment, process, or operation) can be found in the Engineering Evaluations. This facility is not a major HAP source. This facility is not subject to any NSPS or NESHAP requirements

5. Monitoring and Operational Requirements

Applicable monitoring and operational requirements for which this facility is required to comply are identified in the Title V permit (for example, Section D, F, H, and J and Appendix B of the proposed Title V permit). Discussion of any applicable monitoring and operational requirements can be found in the Engineering Evaluations. Compliance Assurance Monitoring (CAM) requirements of 40 CFR Part 64 do not apply to any of the permitted emission sources at this facility.

6. Permit Features

Permit Shield

A permit shield is an optional part of a Title V permit that gives the facility an explicit protection from requirements that do not apply to the facility. A permit shield is a provision in a permit that states that compliance with the conditions of the permit shall be deemed compliance with all identified regulatory requirements. To incorporate a permit shield into the Title V permit involves submission of applications for change of conditions for each equipment affected by the permit shield. Permit shields are addressed in Rule 3004 (c). This facility has not applied for a permit shield.

Streamlining Requirements

Some emission units may be subject to multiple requirements which are closely related or redundant. The conditions may be streamlined to simplify the permit conditions and compliance. Emission limits, work practice standards, and monitoring, recordkeeping, and reporting requirements may be streamlined. Compliance with a streamlined condition will be deemed compliance with the underlying requirements whether or not the emission unit is actually in compliance with the specific underlying requirement. This facility has not applied for any streamlined conditions.

7. Summary of Emissions and Health Risks

Criteria Pollutant Emissions (tons/year) Annual Reported Emissions for Reporting Period 2006/2007

Pollutant	Emissions (tons/year)
NO _x	2.0
CO	5.97
VOC	90.89
PM	11.45
SO _x	0.04

Toxic Air Contaminants Emissions (TAC) Annual Reported Emissions for Reporting Period 2006/2007

The Following TACs Were Reported	Emissions (lbs/yr)
Ammonia	454.848
Benzene	1.137
Formaldehyde	2.416
Naphthalene	0.042
PAHs, Total w/o individ components reported (PAH, POM)	0.014

Health Risk from Toxic Air Contaminants

The facility is subject to review by the Air Toxics Information and Assessment Act (AB2588). AQMD is currently tracking the facility based on the Fiscal Year 2005-2006 emission inventory.

8. Compliance History

As noted, the facility has been in constant operation since 1926, they are located in an area that is a combination of industrial and residential. The facility has been subject to both self-reporting requirements and AQMD inspections. There have been 3 complaints in the past 2 years credited to MCP Foods. The facility has been issued 1 Notice to Comply to submit an application to establish NO_x RECLAIM concentration limit for their boiler and catalytic afterburner. Corrective action has been taken.

9. Compliance Certification

By virtue of the Title V permit application and issuance of this permit, the reporting frequency for compliance certification for the facility shall be annual.

10. Comments

Incorporated in this proposed permit are Minor Permit changes, mostly for easier identification and condition wording consistency. The complete evaluation is attached for review.